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March 29, 2012

VIA FEDERAL EXPRESS

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
9300 Hampton Drive
Capitol Heights, MD 20743

**Re: WC Docket No. 10-90
Alltel Communications, LLC d/b/a Verizon Wireless 2012 Eligible
Telecommunications Carrier Certification and Annual Report for the State
of Florida, pursuant to 47 U.S.C. § 254(e), 47 C.F.R. § 54.313 and 47 C.F.R.
§ 54.314**

Dear Ms. Dortch:

Alltel Communications, LLC d/b/a Verizon Wireless ("Alltel") hereby submits the original and four (4) copies of the following information, which includes the annual certification required by 47 C.F.R. § 54.314, and the annual report required by the Commission's Report and Order issued November 18, 2011¹ and 47 C.F.R. § 54.313:

- HIGH-COST CERTIFICATION PURSUANT TO 47 C.F.R. § 54.314
- PUBLIC VERSION OF 2012 ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND ANNUAL REPORT OF ALLTEL COMMUNICATIONS, LLC d/b/a VERIZON WIRELESS FOR THE STATE OF FLORIDA
 - Exhibit A – Designated Service Area for Study Area Code 219903
 - Public Version of Confidential Exhibit B – Progress Report on Service Improvement Plan

¹ *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*), *pets. for review pending*, *Direct Commc'ns Cedar Valley, LLC v. FCC*, No. 11-9581 (10th Cir. filed Dec. 18, 2011); *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Order, DA 12-147 (WCB Feb. 3, 2012) (*Clarification Order*).

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- Public Version of Confidential Exhibit C – Coverage Map
- Public Version of Confidential Exhibit D – Updated Service Improvement Plan for 2012
- Public Version of Confidential Exhibit E – Actual Support received and 2012 Projected Support from the Federal Universal Service Fund
- Public Version of Confidential Exhibit F – Outage Report
- Exhibit G – Unfulfilled Requests for Service
- Exhibit H – Company Information
- (separate marked envelope) CONFIDENTIAL VERSION OF 2012 ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND ANNUAL REPORT OF ALLTEL COMMUNICATIONS, LLC d/b/a VERIZON WIRELESS FOR THE STATE OF FLORIDA
 - Exhibit A – Designated Service Area for Study Area Code 219903
 - Confidential Exhibit B – Progress Report on Service Improvement Plan
 - Confidential Exhibit C – Coverage Map
 - Confidential Exhibit D – Updated Service Improvement Plan for 2012
 - Confidential Exhibit E – Actual Support received and 2012 Projected Support from the Federal Universal Service Fund
 - Confidential Exhibit F – Outage Report
 - Exhibit G – Unfulfilled Requests for Service
 - Exhibit H – Company Information
- ALLTEL COMMUNICATIONS, LLC d/b/a VERIZON WIRELESS' REQUEST FOR CONFIDENTIAL TREATMENT OF EXHIBITS TO 2012 ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND ANNUAL REPORT FOR THE STATE OF FLORIDA

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Verizon Wireless' Request for Confidential Treatment pursuant to 47 C.F.R. §§ 0.457(d) and 0.459 is made with respect to Confidential Exhibits B, C, D, E and F. These confidential materials are enclosed in a separate, marked envelope.

These filings are submitted for the study area listed below:

State	Spin	Study Area Code	Study Area Name
FL	143008900	219903	Alltel Communications, LLC d/b/a Verizon Wireless

If you have any questions, please contact me.

Sincerely,


Matthew A. Slaven

MAS/pk
Enclosures
cc: Universal Service Administrative Company

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Connect America Fund

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WC Docket No. 10-90

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**ALLTEL COMMUNICATIONS, LLC d/b/a VERIZON WIRELESS REQUEST FOR
CONFIDENTIAL TREATMENT OF EXHIBITS TO 2012 ELIGIBLE
TELECOMMUNICATIONS CARRIER CERTIFICATION AND ANNUAL REPORT
FOR THE STATE OF FLORIDA**

March 29, 2012

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For the reasons stated herein, Alltel Communications, LLC d/b/a Verizon Wireless (“Alltel” or the “Company”) hereby requests that **Confidential Exhibit B** (Progress Report on Service Improvement Plan), **Confidential Exhibit C** (Coverage Map), **Confidential Exhibit D** (Updated Service Improvement Plan for 2012), **Confidential Exhibit E** (2011 Actual Support Received and 2012 Projected Support From Federal Universal Service Fund) and **Confidential Exhibit F** (Outage Report) to the attached 2012 Eligible Telecommunications Carrier Certification and Annual Report for the State of Florida, be treated as confidential and not routinely available for public inspection pursuant to 47 C.F.R. §§ 0.457(d) and 0.459. Redacted copies of **Confidential Exhibit B**, **Confidential Exhibit C**, **Confidential Exhibit D**, **Confidential Exhibit E** and **Confidential Exhibit F** are being filed separately today for inclusion in the public record. In addition, the Company requests that its proprietary, non-public complaint data be treated as confidential and not routinely available for public inspection pursuant to 47 C.F.R. §§ 0.457(d) and 0.459. This confidential data has been redacted from the public version of the Company’s annual report submitted herewith.

Confidential Exhibit B, Confidential Exhibit C, Confidential Exhibit D, Confidential Exhibit E and Confidential Exhibit F contain information that qualifies as “commercial or financial information” that “would customarily be guarded from competitors,” regardless of whether or not such materials are protected from disclosure by a privilege. *See* 47 C.F.R. § 0.457(d); *see also Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992) (“[W]e conclude that financial or commercial information provided to the Government on a voluntary basis is ‘confidential’ for the purpose of Exemption 4 if it is the kind that would customarily not be released to the public by the person from whom it was obtained.”).

The confidential information contained in **Confidential Exhibit B** and **Confidential Exhibit D** relates to the status of historical and proposed infrastructure expenditures and capital improvements in Alltel's designated areas in Florida, as well as operating and maintenance expense information. **Confidential Exhibit C** is a signal coverage map that illustrates, among other things, the location of infrastructure improvements in the designated areas. **Confidential Exhibit E** reflects the amount of universal service support the Company has received after the application of non-public accounting for adjustments and true-ups associated with the Alltel-Atlantis merger cap and future estimates based on projected baseline support and the application of any anticipated non-public true-ups.

The Commission has previously determined that information in a Service Improvement Plan is "Confidential" and has granted a Protective Order to allow access to and to protect against the dissemination of such "Confidential" information.¹ The Commission routinely grants Protective Orders to protect the confidentiality of such information.² Since the information in **Confidential Exhibit B** is a Progress Report on Alltel's previously filed Service Improvement Plan, **Confidential Exhibit C** is a map showing the location of projected infrastructure improvements, **Confidential Exhibit D** is an update to the Service Improvement Plan and

¹ See *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc. et al. Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment*, WC Docket 05-337, CC Docket 96-45, Order, 23 FCC Rcd 8834 (2008); *In the Matter of Federal-State Joint Board on Universal Service, RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket 96-45, Order, 17 FCC Rcd 23532 (WCB 2002).

² See *In the Matter of Federal-State Joint Board on Universal Service Petition of Cingular Wireless, LLC for Designation as an Eligible Telecommunications Carrier in the State of Georgia*, CC Docket No. 96-45, Order, 22 FCC Rcd 15244, ¶¶ 1-3 (WCB 2007); *In the Matter of Federal-State Joint Board on Universal Service NEP Cellcorp, Inc. Application for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania*, CC Docket No. 96-45, Order, 22 FCC Rcd 15252, ¶ 2 (WCB 2007); *In the Matter of Federal-State Joint Board on Universal Service Petition of Centennial USVI Operations Corp. Petition for Designation as an Eligible Telecommunications Carrier in the United States Virgin Islands*, CC Docket No. 96-45, Order, 22 FCC Rcd 16988, ¶ 2 (WCB 2007).

Confidential Exhibit E sets forth the amount of support received in 2011 and payment to be received in 2012, the Exhibits should be afforded “Confidential” status.

Confidential Exhibit B, Confidential Exhibit C, Confidential Exhibit D, and Confidential Exhibit E contain sensitive information that if disclosed could place Alltel at a competitive disadvantage, including specific information regarding capital and operating expenditures, future construction plans, and anticipated universal service support funding levels that warrant protection under 47 C.F.R. § 0.459. Alltel would be placed at a significant disadvantage if this information were revealed to competing service providers, who stand to benefit competitively from any knowledge of the redacted commercial and financial information included in these materials. If the redacted commercial and financial information were disclosed to competitors of Alltel, they could use such information to compete against Alltel or take other action that would place the Company at a substantial competitive disadvantage. In addition, Alltel’s future ability to negotiate with vendors could be prejudiced by the disclosure of this information. The redacted material is not and has not previously been made available to the public, and Alltel has taken internal precautions to ensure that such information is not disclosed to the public. Likewise, if made public, the Company’s proprietary complaint data could be used by its competitors to derive an unfair competitive financial benefit through targeted marketing or other initiatives.

Confidential Exhibit F contains highly sensitive network outage information required by 47 C.F.R. § 54.209(a). Commission Rule 54.209(a) was modeled on the outage reporting requirements in 47 C.F.R. Part 4. When it adopted the Part 4 reporting requirements, the Commission found that such data presents national security and competitive concerns and should be deemed confidential when filed with the Commission. *In the Matter of New Part 4 of the*

Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 16830, ¶ 3 (2004) ("This data, though useful for the analysis of past and current outages in order to increase the reliability and security of telecommunications networks in the future, could be used by hostile parties to attack those networks, which are part of our Nation's critical information infrastructure. The disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity. We therefore will treat the information that will be provided as confidential.") The information in **Confidential Exhibit F** is entitled to be treated as confidential for these same reasons.

Respectfully submitted,

March 29, 2012

BRIGGS AND MORGAN, P.A.

By


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